

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

CYNTHIA K. HAYNES (a/k/a Cynthia K.)
Randolph), individually and under the Missouri)
Wrongful Death Statute)
)
Plaintiff,)
)
vs.) Case No: 1:21-CV-00160-ACL
)
JENNIFER WILLIAMS, individually, et al.)
)
Defendants.)

THE PARTIES' JOINT MOTION FOR PROTECTIVE ORDER

Come now Plaintiff Cynthia K. Haynes (a/k/a Cynthia K. Randolph) and Defendants Jennifer Williams, individually, and Jennifer Williams, d/b/a Williams Law (collectively hereinafter “Williams”), Spain, Miller, Galloway & Lee, LLC (“Spain Miller”) and Charles Haynes (collectively the “Parties”), by and through undersigned counsel, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, hereby move for the entry of the Joint Proposed Protective Order, attached hereto as **Exhibit A**. In support thereof, the Parties state:

1. This action arises from the suicide of Plaintiff’s minor daughter, M.H. The Parties agree that, due to the subject matter of this lawsuit, certain documents that have or will be produced in this litigation are of a confidential or privileged nature and must be protected from unwarranted public disclosure.
2. Federal Rules of Civil Procedure permit the Court to enter a protective order.
3. The Parties submit that they have conferred in good faith and have reached an agreement as to a Joint Protective Order that will serve to prevent the disclosure of matters deemed “Confidential” under the terms of the Joint Protective Order to any persons or entities other than

those involved in the prosecution or defense of this litigation. The Parties' Joint Proposed Protective Order is attached as **Exhibit A** hereto.

WHEREFORE, the Parties jointly request that this Court grant the Parties' Joint Motion for Protective Order and enter the Parties' Joint Proposed Protective Order, attached as **Exhibit A** hereto, and for any other relief this Court deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2022, the foregoing was emailed only to all counsel of record.

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